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October 2, 2020

BY ECF

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

USDC SDNY
DOCUMENT
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Re: U.S. v. Martinez (MKV)
20 Cr. 213

Dear Judge Vyskocil,


I represent Victor Martinez in the above captioned case. He is currently out on bond, with one of the conditions being that his travel is restricted to the Eastern and Southern Districts of New York. I am writing to respectfully request that Mr. Martinez's bail conditions be temporarily modified to allow him to travel to Boston, Massachusetts to visit his mother Jeanine Martinez. Ms. Martinez suffered two strokes on October 1, 2020 and is currently hospitalized. Mr. Martinez would like to travel to Massachusetts from October 3, 2020 through October 11, 2020.

I have spoken to the Government who take no position but defer to Pretrial Services. Mr. Martinez's Pretrial officer Ms. Piperato has no objection to this request, as long as Mr. Martinez provides her with the address where he will be staying and continues to check in with her weekly.


I therefore request that the Court modify his bail conditions to afford him the opportunity visit his ailing mother.

GRANTED. Mr. Martinez may travel to Boston from October 3, 2020 until October 11, 2020, provided that he provides to Pretrial Services the address where he will be staying, any contact information for him at that address, and continues to check in with his Pretrial Services Officer as scheduled. SO ORDERED.

Date: 10/2/2020
New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully Submitted,


Christine Delince, Esq.